

REMARKS

With this response, Claims 1-7, 10-12, 14, 16-21, 23-24, and 28-31 are amended, Claims 13 and 22 are canceled without comment, prejudice or disclaimer, and new Claims 32-33 are added. ApplicantS believe that no additional claim fees are required, since new Claims 32 and 33 replace canceled Claims 13 and 22. Applicants respectfully request reconsideration and withdrawal of the rejections in light of the amendments and in view of the remarks presented below.

1. Claims 1-2 and 4-10 Are Allowable

Applicants traverse the rejections of Claims 1-2 and 4-10 under 35 U.S.C. §102(e) over U.S. Patent No. 7,015,954 ("Foote"), at page 2 of the Office Action. Claim 1 recites an image capture system including "a processing engine," "a first image sensor," "a second image sensor," and "a mounting surface on which the processing engine and the first and the second image sensors are secured." Foote discloses a video system having a camera array, a combining device, a view selection device, and an output mechanism. (Foote, col. 18, lines 9-13, Figure 15). In contrast to Claim 1, Foote fails to disclose or suggest "a mounting surface on which the processing engine and the first and the second image sensors are secured," as recited in Claim 1. Therefore, Foote does not disclose or suggest each and every element of Claim 1 or of Claims 2 and 4-10, at least by virtue of their dependency from Claim 1. For at least the foregoing reasons, the rejection of Claims 1, 2 and 4-10 should be withdrawn.

2. Claims 11-12, 14-21 Are Allowable

Applicants traverse the rejections of Claims 11-12, 14-18, and 20-21 under 35 U.S.C. §102(e) over Foote, at pages 7-10 of the Office Action, and Claim 19 under 35 U.S.C. §103(a) over Foote, at page 17 of the Office Action. Claim 11 recites an image capturing system including "an integrated circuit" that includes "a first image module," "a second image module," and "a processing engine." Foote fails to disclose or suggest an integrated circuit comprising a first image module, a second image module, and a processing engine. Accordingly, Foote does not disclose all of the elements of Claim 11, or of Claims 12 and 14-21, at least by virtue of their dependency from Claim 11. For at least the foregoing reasons, Foote fails to disclose or suggest

each and every element of claims 11-12 and 14-21 under §§102(e) or 103(a), and the rejection of Claims 11-12 and 14-21 should be withdrawn.

3. Claims 23-31 Are Allowable

Applicants traverse the rejections of Claims 23-31 under 35 U.S.C. §102(e) over Foote, at pages 11-15 of the Office Action. Claim 23 recites an image capturing method that includes “correlating a plurality of digital image sensors with different views of a scene,” where “an integrated circuit comprises a processing engine and at least one of the plurality of digital image sensors.” Foote fails to disclose or suggest “an integrated circuit comprises a processing engine and at least one of a plurality of digital image sensors,” as recited in Claim 23. Therefore, Foote fails to disclose or suggest each and every element of Claim 23 and of Claims 24-31, at least by virtue of their dependency from Claim 23. Therefore, the rejection of Claims 23-31 over Foote should be withdrawn.

4. Claims 3, 11, and 23 are Allowable over Foote in view of Li

Applicants traverse the rejection of Claim 3 under 35 U.S.C. §103(a) over Foote in view of U.S. Patent No. 7,092,014 (“Li”), at pages 16-17 of the Office Action. Claim 3 recites “a third image sensor” and “an integrated circuit” that includes “the first image sensor, the second image sensor, the third image sensor, and the processing engine.” The Office Action acknowledges that Foote fails to disclose or suggest an integrated circuit comprising the first image sensor, the second image sensor, a third image sensor, and the processing engine. (See Office Action, p. 16). The Office Action asserts that Li discloses this feature.

Li discloses that all or part of the invention can be implemented in one or more application specific integrated circuits (ASICs). (Li, col. 4, lines 44-46). However, Li fails to disclose or suggest that an ASIC includes the processing engine and one or more image sensors. In particular, none of the embodiments shown in Li include both the camera and the processor. (See Li, figures 1-24). Further, Li discloses that the system renders views generated from images captured by a longitudinally aligned camera array, but that “the system 120 does not itself include such an array.” (Li, col. 5, lines 54-55). Additionally, Li discloses that the camera is coupled to a bus of the system via a camera interface, and that the coupling of the camera to the

camera interface is by a wired or wireless connection. (Li, col. 6, line 61 to col. 7, line 5). Such a connection is technically inconsistent with the particular arrangement of the features recited in Claims 3, 11, and 23. In particular, Li does not disclose or suggest "an integrated circuit comprising the first image sensor, the second image sensor, the third image sensor, and the processing engine," as recited in Claim 3. Further, Li does not disclose or suggest "an integrated circuit" including "a first image module," "a second image module" and "a processing engine," as recited in Claim 11. Li does not disclose or suggest a method that includes "correlating a plurality of digital image sensors with different views of a scene, wherein an integrated circuit comprises a processing engine and at least one of the plurality of digital image sensors," as recited in Claim 23. Hence, Li fails to overcome the deficiencies of Foote. Therefore, the asserted combination of Foote and Li does not disclose or suggest each and every element of Claims 3, 11 and 23. For at least the foregoing reasons, the rejection of Claims 3, 11 and 23 over Foote and Li should be withdrawn.

Further, there is no motivation to combine Foote and Li, because the disclosure of Foote teaches away from the disclosure of Li. In particular, Foote discloses a camera array with each camera having a fixed position. (Foote, col. 2, lines 64-65). Further, Foote discloses that video images can be used as a virtual camera that is controlled electronically without physical motion. (Foote, col. 3, lines 42-47). In direct contrast, Li discloses capturing multiple images using a longitudinal camera array that is rotated through a capture cylinder, with each camera in the array capturing multiple images as the array rotates. (Li, col. 2, lines 41-43). Thus, the stationary camera array of Foote is technically inconsistent with and teaches away from the rotating camera array of Li. Therefore, there is no motivation to make the asserted combination, and the rejection of claims 3, 11 and 23 over Foote and Li should be withdrawn.

As discussed above, Li and Foote provide no motivation for making the asserted combination. Moreover, since the teachings of Foote (stationary camera array) are technically inconsistent with the teachings of Li (rotating camera array), a worker skilled in the art would not be motivated to make the asserted combination, because there is no likelihood of success in combining the moving system of Li with the stationary system of Foote. Accordingly, the only motivation for combining the teachings of Foote and Li is provided by the present application.

The mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious unless the prior art suggested the desirability of the modification. ... It is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the prior art so that the claimed invention is rendered obvious.

In re Fritch, 972 F. 2d 1260, 23 USPQ2d 1780 at 1783-84 (Fed. Cir. 1992).

Hence, the asserted combination fails to disclose or suggest each and every element of claims 3, 11, and 23. Moreover, there is no motivation to make the asserted combination because Foote and Li are technically inconsistent and teach away from one another. For at least the foregoing reasons, the rejection of claims 3, 11, and 23 should be withdrawn.

6. New Claims 32 and 33 Are Allowable

New Claims 32 and 33 are added. New independent Claim 32 recites an image capturing method including "receiving image data from a plurality of image sensors, wherein an integrated circuit comprises a processing engine and at least one of the plurality of image sensors." None of the cited references, alone or in combination, disclose the particular arrangement of features recited in Claim 32. Therefore Claim 32 is allowable. Claim 33 depends from Claim 32, and is therefore allowable at least by virtue of its dependency from allowable Claim 32.

CONCLUSION

Applicants have pointed out specific features of the claims not disclosed, suggested, or rendered obvious by the references applied in the Office Action. Accordingly, Applicants respectfully request reconsideration and withdrawal of each of the rejections, as well as an indication of the allowability of each of the pending claims.

Any changes to the claims in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

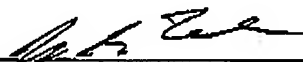
The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

Attorney Docket No.: 1033-T00529

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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Date


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